

## **REMARKS**

Claim 13 is amended. Claims 1, 2, 4-7 and 10 are cancelled. Claims 23-43 are added. Claims 3, 13 and 23-43 are in the application for consideration.

The specification is amended for clarification.

Independent claim 3 stands rejected as being obvious over a combination of any of Wang et al., AmRhein et al., Stone et al., or De Boer in view of U.S. Patent No. 6,544,341 to Omstead et al. Applicant disagrees and requests reconsideration.

Omstead et al. is relied upon for its teaching of CVD of copper onto a semiconductor workpiece within a deposition chamber. The Examiner asserts that upon supplying gas to a chamber, a portion of the gas will also deposit onto the components of the chamber including the susceptor, and the Examiner provides an alleged motivation to do so. However, Omstead et al. specifically teaches against the deposition of copper onto its susceptor, and specifically away from depositing any copper onto the backside of its susceptor. Specifically, Fig. 3 of Omstead et al. shows a gas outlet 30 which is received elevationally above the backside of support chuck 28. Further, the backside of support chuck 28 is restricted from undesired deposition of copper or other materials the result of purge gas flowing through components 44, 46 and 48 to the susceptor backside and outwardly of exhaust port 30. Omstead et al. specifically teaches against the deposition of any copper onto its support chuck 28 at col.7, Ins.12-15.

See *also*, col.9, Ins.50-55 and 63-66, and also col.10, Ins.10-26, which clearly teaches against, and the prevention of, the deposition of any copper onto at least the backside of support chuck 28. Accordingly, the Examiner's apparent conclusion that the copper precursor gas will also deposit onto the backside of the susceptor is fundamentally in error.

None of Wang et al., AmRhein et al., Stone et al. or De Boer cure the defect identified above with respect to Omstead et al. Therefore, no combination of the cited references renders obvious or encompasses all the limitations of Applicant's independent claim 3. Accordingly, such claim should be allowed, and action to that end is requested.

Independent claim 13 stands rejected as being anticipated over U.S. Patent Application Publication 2003/0215963 to AmRhein et al. Claim 13 has been amended to emphasize that the substrate susceptor physically supports a semiconductor substrate to be deposited upon, and that the front substrate receiving side face comprises a bearing surface to so support such substrate. Claim 13 is also amended to recite that the bearing surface is received by the stated ring.

The Examiner asserts that AmRhein et al. discloses Applicant's claim-recited ring as component 32 in Fig. 1. The Examiner is mistaken. Specifically, component 32 is a thermocouple and does not constitute a portion of the body of the substrate holder 20 of AmRhein et al. Further, substrate holder 20 is clearly shown in Fig. 4 and described in paragraph [0031] as not comprising a "ring" as such has been defined in Applicant's


claim 13. Accordingly, Applicant's amended claim 13 recites something which is not encompassed by the AmRhein et al. '963 reference, and the anticipation rejection thereover should be withdrawn. Action to that end is requested.

Applicant's added dependent claims 23-43 are supported literally from Applicant's specification and/or drawings as-filed. Such should be allowed as depending from allowable base claims, and for their own recited features which are neither shown nor suggested in the cited art. Action to that end is requested.

This application is believed to be in immediate condition for allowance, and action to that end is requested.

Respectfully submitted,

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